

1 RONALD E. WOOD, SBN 133854  
rwood@proskauer.com  
2 JENNIFER L. ROCHE, SBN 254538  
jroche@proskauer.com  
3 PROSKAUER ROSE LLP  
2049 Century Park East, Suite 3200  
4 Los Angeles, CA 90067-3206  
Telephone: 310-557-2900  
5 Facsimile: 310-557-2193

6 Attorneys for Defendant  
Wachovia Securities, LLC  
7 n/k/a Wells Fargo Advisors, LLC

8  
9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 OAKLAND DIVISION

12 GREGORY R. RAIFMAN and SUSAN  
13 RAIFMAN, husband and wife, individually and  
on behalf of their marital community and as  
14 Trustees of the RAIFMAN FAMILY  
REVOCABLE INTER VIVOS TRUST and as  
15 beneficiaries of the PALLADIAN TRUST;  
GEKKO HOLDINGS, LLC, and HELICON  
16 INVESTMENTS, LTD; EDWARD and  
LORRAINE KURATA, as husband and wife;  
17 JAMES LOOMIS; JEFFREY CHOU; and  
BRUCE CARDINAL, as Trustee of the  
18 ROBERT J. CARDINAL  
GRANDCHILDREN'S TRUST, and the  
19 MARION I. CARDINAL TRUST, and as  
Managing Member of REDBIRD  
INVESTMENT GROUP, LLC.,

20 Plaintiffs,

21 v.

22 WELLS FARGO ADVISORS, LLC, successor  
23 in interest to WACHOVIA SECURITIES,  
LLC; and WACHOVIA SECURITIES, LLC,

24 Defendants.  
25

Case No. C 11-02885 SBA

**STIPULATION TO ENLARGE  
DEFENDANT'S TIME TO RESPOND TO  
PLAINTIFFS' SECOND AMENDED  
COMPLAINT, PLAINTIFFS' TIME TO  
OPPOSE ANY MOTION MADE  
PURSUANT TO FRCP 12(b) AND  
DEFENDANT'S TIME TO REPLY**

Hon. Saundra B. Armstrong

26 WHEREAS, on March 19, 2013, Plaintiffs, Gregory R. Raifman and Susan Raifman,  
27 husband and wife, individually and on behalf of their marital community and as Trustees of Plaintiff,  
28 The Raifman Family Revocable Inter Vivos Trust, as beneficiaries of Plaintiff, The Palladian Trust,

as sole members of Gekko Holdings, Ltd. and as assignees in interest and beneficial owners of Plaintiff, Helicon Investments, Ltd.; Edward and Lorraine Kurata, husband and wife; James Loomis; Jeffrey Chou and Bruce Cardinal, as Trustee of the Robert J. Cardinal Grandchildren's Trust, and as Trustee of the Marion I. Cardinal Trust, and as Managing Member of Redbird Investment Group, LLC. (collectively, "Plaintiffs"), filed their Second Amended Complaint ("SAC") in this action;

WHEREAS, Defendant Wachovia Securities, LLC n/k/a Wells Fargo Advisors, LLC's ("Defendant") response to the SAC is due on April 2, 2013, pursuant to Federal Rule of Civil Procedure 15(a)(3);

WHEREAS, Plaintiffs' opposition to any motion Defendant may make pursuant to Federal Rule of Civil Procedure 12(b) would be due on April 16, 2013, pursuant to Local Rule 7-3;

WHEREAS, Defendant's reply to any opposition Plaintiffs may file would be due on April 23, 2013, pursuant to Local Rule 7-3; and

WHEREAS, the parties have discussed and agreed that it is their mutual request to extend their respective filing dates,

NOW, THEREFORE, the parties, through their counsel, hereby stipulate and agree, pursuant to Local Rule 6-1, that Defendant shall have up to and including April 16, 2013, to answer or otherwise respond to the SAC; that Plaintiffs shall have up to and including May 7, 2013 to file an opposition to any motion Defendant may file pursuant to Federal Rule of Civil Procedure 12(b); and that Defendant may thereafter have up to and including May 21, 2012 to file any reply to any opposition Plaintiffs may file. This Stipulation is agreed upon without prejudice to Plaintiffs' right to seek an additional extension of time after Defendant's filings and in the event that multiple motions are filed by Defendant. This extended briefing schedule will not alter the date of any event or deadline already fixed by Court order.

Dated: March 25, 2013

RONALD E. WOOD  
JENNIFER L. ROCHE  
PROSKAUER ROSE LLP

By: / s / Ronald E. Wood

Ronald E. Wood

Attorneys for Defendant

1  
2 Dated: March 25, 2013

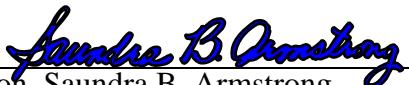
Tod Aronovitz (*Pro Hac Vice*)  
Barbara Perez (*Pro Hac Vice*)  
Andrew Zelmanowitz (*Pro Hac Vice*)  
ARONOVITZ LAW

3  
4  
5 By: / s / Tod Aronovitz

6 Attorneys for Plaintiffs

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8 PURSUANT TO STIPULATION, **IT IS SO ORDERED.**

9  
10 Dated: 3/27/13

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Hon. Sandra B. Armstrong  
United States District Judge